

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF TEXAS

FORT WORTH DIVISION

J.F.,

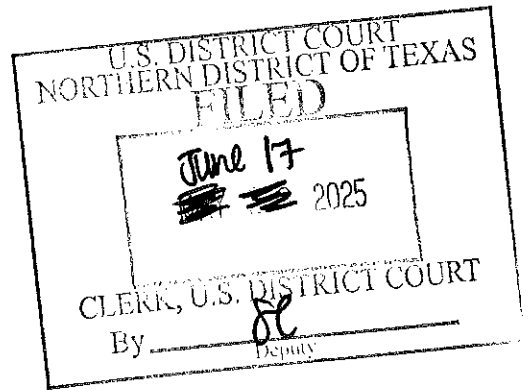
Plaintiff,

v.

LUIS VENTURA,

Defendant.

CIVIL ACTION NO. 4:24-cv-01208-BP



**PLAINTIFF'S NOTICE AND MOTION FOR CONTINUATION OF SERVICE
AND SCHEDULING DEADLINES**

TO THE HONORABLE OFFICERS OF THE COURT:

First and foremost, the Plaintiff respectfully extends heartfelt congratulations to the Court on receiving the 2025 Professional Standard of Care award. This honor is well deserved and reflects the commitment, integrity, and diligence consistently demonstrated by this esteemed bench.

Now comes Plaintiff J.F., pro se, and files this Motion for Continuation of Service Deadlines and Procedural Scheduling, and in support thereof, respectfully shows the Court as follows:

I. GROUNDS FOR CONTINUATION

Plaintiff is presently under documented medical leave and treatment, following a serious health condition requiring ongoing care and rest. Plaintiff is recovering steadily and anticipates resumption of full legal participation in the coming weeks. To ensure due process and fairness to all parties, Plaintiff respectfully requests a continuation of 60 days to allow for:

- Completion of medical care under professional supervision;
 - Preparation of proper service documents;
 - Review and compilation of supporting legal materials and affidavits.
-

II. LEGAL BASIS FOR RELIEF REQUESTED

This request is supported by federal procedural norms and precedent recognizing continuance on grounds of health-related incapacity, including:

- **United States v. Burton**, 584 F.2d 485, 489 (D.C. Cir. 1978) – courts must consider medical incapacity when evaluating extension requests;
- **Raymond v. Ameritech Corp.**, 442 F.3d 600, 607 (7th Cir. 2006) – holding that temporary delays for legitimate health issues may justify modification of procedural deadlines;

Duty Status Report

Case 4:24-cv-01208-O-BP

Document 34

Filed 06/17/25

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U.S. Department of Labor

Office of Workers Compensation Programs



This form is provided for the purpose of obtaining a duty status report for the employee named below. This request does not constitute authorization for payment of medical expense by the Department of Labor, nor does it invalidate any previous authorization issued in this case. This request for information is authorized by law (5 USC 8101 et seq.) and is required to obtain or retain a benefit. Information collected will be handled and stored in compliance with the Freedom of Information Act, the Privacy Act of 1974 and the OMB Cir. A-130. Persons are not required to respond to this collection of information unless it displays a currently valid OMB control number.

OMB No. 1240-0046

Expires: 08/31/2026

OWCP File Number
(If known)

SIDE A - Supervisor: Complete this side and refer to physician

Employee's Name (Last, first, middle)

Date of Injury (Month, day, yr.)

3. Social Security Number

redacted

Describe How the Injury Occurred and State Parts of the Body Affected

See Attached

SIDE B - Physician: Complete this side

8. Does the History of Injury Given to You by the Employee

Correspond to that Shown in Item 5? ☒ Yes ☐ No (If not, describe)

9. Description of Clinical Findings

See letter dated 4/9/25

10. Diagnosis(es) Due to Injury

See Attached

redacted

12. Employee Advised to Resume Work?

☒ Yes, Date Advised 8/1/25 ☐ No

redacted

by			Hrs Per Day
14. Are Interpersonal Relations Affected Because of a Neuropsychiatric Condition? (e.g. Ability to Give or Take Supervision, Meet Deadlines, etc.) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Describe)			
15. Date of Examination 4/3/25		16. Date of Next Appointment	
17. Specialty Chiropractic		18. Tax Identification Number redacted	
19. Physician's Signature [Signature]		20. Date 6/9/25/25	CA-17 (Rev. 04/20)

redacted

redacted

Redacted

April 9, 2025

Re: Jamie Fanner

To whom it may concern:

Ms. Fanner presented to my office on April 3, 2025, reporting severe pain in her neck, thoracic spine, lumbar spine, shoulders, and wrists. She stated that her pain began in 2018 but significantly worsened following a severe stress event i

Redacted

Physical examination revealed moderate to severe restriction in cervical and lumbar spine mobility. Reflex testing showed diminished responses in the left biceps (C5-C6), brachioradialis (C5-C6), triceps (C7-C8), and patellar (L2-L4) reflexes, with clonus observed in the right patellar reflex. Sensory examination indicated hyperesthesia in the left lateral and posterior arm, as well as the left medial and lateral thigh. The Doorbell orthopedic test elicited radiating pain into the left arm. Severe paraspinal muscle spasms were noted on the right from C1-C3, bilaterally from C4-C7 and T2-L5, and in the scalene muscles bilaterally.

Radiographic imaging revealed phase 2 degenerative disc disease in the lower cervical spine and early degenerative changes at the L5-S1 disc. Additionally, a congenitally short right leg contributes to a significant rightward pelvic tilt, altering spinal biomechanics and exacerbating muscular strain.

Ms. Fanner's structural abnormalities, compounded by the extreme mental and emotional stress she Redacted, likely triggered a sympathetic autonomic response. This response may have precipitated a cascade of musculoskeletal changes, including persistent muscle tightening and spasms. The resulting tension in key areas—such as the scalene muscles and brachial plexus—could have disrupted clavicular and scapular alignment, compromising shoulder function and contributing to nerve irritation affecting the arm, forearm, and hand.

Based on Ms. Fanner's history, consultation, and clinical findings, I conclude that the severe stress event in Redacted was a significant contributing factor to the onset and persistence of her current generalized and specific symptoms. Redacted

Sincerely,

D. J. L. R.

Redacted

Tarrant County Constable Precinct 7

Mansfield Subcourthouse
1100 East Broad Street- Suite 201
MANSFIELD, TX 76063

Phone: 817-473-5110 Fax: 817-473-5109

2054

Payment Receipt

Payment made by: J.F. (CONFIDENTIAL)
475 East FM 1382
P.O. BOX 394
CEDAR HILL TX 75104

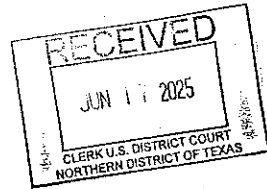
Payment Date:	6/12/2025
Payment Type:	Cash
Receipt Number:	2054
Payment Amount:	75.00
Cause #:	CV-01208-O-BP
Receiving Pct:	Constable #7 Fee

CASH CASH CASH

J.F.
475 E FM 1382
P.O. Box 394
Cedar Hill, TX
75104

F	US POSTAGE IMI 889950612181337 2000393333
	\$9.24 SSK FCM
08/12/25 Mailed from 75104 028W2312154	
USPS FIRST-CLASS MAIL®	
J.F. CONFIDENTIAL 475 E FM 1382 CEDAR HILL TX 75104	2.00 oz RDC 99
RETURN RECEIPT REQUESTED	
SHIP TO: COURT CLERK ATTN: FILING DEPT ROOM 310 501 WEST 10TH STREET FORT WORTH TX 76102	
USPS CERTIFIED MAIL®	
9507 1086 2481 5163 9577 26	

U.S. District Court
501 West 10th Street
Room 310
Fort Worth, TX



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